

EXHIBIT D

Patricia M. Mayer, Esquire
WATERMAN & MAYER, LLP
301 Oxford Valley Rd., Ste. 203B
Yardley, PA 19067
(215) 493-4300
pmayer.esq@comcast.net
Attorney for Debtor

In re:	:	UNITED STATES BANKRUPTCY COURT
	:	DISTRICT OF NEW JERSEY
	:	
Robert S. Voorhees,	:	Chapter 13
	:	Bankruptcy No. 16-32035-CMG
Debtor.	:	
	:	CERTIFICATION OF DEBTOR
	:	IN SUPPORT OF MOTION
	:	TO CONVERT CASE TO A CHAPTER 7

Debtor, Robert S. Voorhees, by and through his undersigned counsel, pursuant to 11 U.S.C. § 1307(a) hereby elects to convert the above-captioned Chapter 13 bankruptcy case to a case under Chapter 7 of the Bankruptcy Code. The Debtor is entitled to convert his case for the following reasons:

1. The Debtor commenced this case on November 11, 2016, by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Code.
2. The Debtor is eligible to be a Debtor under Chapter 7 of the Bankruptcy Code.

WHEREFORE, the Debtor requests that this Court enter an Order converting this case to a case under Chapter 7 of the Bankruptcy Code.

January 10, 2017

/s/ Patricia M. Mayer
Patricia M. Mayer

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

In re: : Chapter 13
: Bankruptcy No. 16-32035-CMG
Robert S. Voorhees, :
: **HEARING DATE: 2/15/17 @ 9:00 A.M.**
Debtor. : **COURTROOM NO. 3**

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Debtor, Robert S. Voorhees, has filed with the Court a Motion to Convert Cast to Chapter 7.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before 1/31/2017 you or your attorney must do **all** of the following:

- (a) file an answer explaining your position at:
Clerk, U.S. Bankruptcy Court
402 East State Street
Trenton, NJ 08608

If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the movants' attorney:
Patricia M. Mayer, Esquire
301 Oxford Valley Road, Suite 203B
Yardley, PA 19067
Phone: (215) 493-4300/Fax: (215) 493-4304

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Christine M. Gravelle on February 15, 2107, at 9:00 a.m., in Crtrm. 3, Clarkson S. Fisher US Courthouse, 402 E. State Street, Trenton, New Jersey 08608. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed.R.Bankr.P. 9014(d).

4. If a copy of the motion is not enclosed, a copy will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (609) 858-9333 to find out whether the hearing has been canceled because no one filed an answer.

Dated: 1/10/2017

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Proposed Order
Page 1 of 3

In Re:

Case No.: _____

Hearing Date: _____

Judge: _____

Chapter: _____

ORDER CONVERTING CASE TO CHAPTER 7

The relief set forth on the following pages numbered two (2) and three (3) is **ORDERED**.

Upon the motion of _____ and
for good cause shown, it is

ORDERED that this case is converted from chapter _____ to chapter 7, and it is
further

ORDERED that within 14 days of the date of this Order the debtor shall file:

- amendments to previously filed schedules and statements as necessary,
- all schedules and statements required by 11 U.S.C. § 521(a), if such documents have not already been filed,
- a schedule of all property which was acquired after the commencement of the case, but before the entry of this order,
- a schedule of executory contracts and unexpired leases entered into or assumed after the commencement of the case, but before the entry of this order,
- a schedule of unpaid debts incurred after the commencement of the case, but before the entry of this order.

ORDERED that the United States Trustee shall immediately appoint a chapter 7 trustee in
this case, and it is further

ORDERED that if the case is converting from chapter 11, the debtor or chapter 11 trustee
shall:

- immediately turn over to the chapter 7 trustee, all records and property of the estate in his/her custody or control,
- ☐ within 120 days of the date of this order, file a Final Report including an accounting of all receipts and distributions or a statement indicating why the report cannot be filed, and it is further

ORDERED that if the case is converting from chapter 13, the chapter 13 trustee shall:

- within 120 days of the date of this order, file a Final Report including an accounting of all receipts and distributions or a statement indicating why the report cannot be filed, and it is further

ORDERED, that if the case is converting from chapter 13, upon the filing of the trustee's Final Report, the chapter 13 trustee is discharged as trustee of the estate and the bond is cancelled.

rev. 8/1/15